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16 and COHEN ASSET MANAGEMENT, INC.

17

18 **UNITED STATES DISTRICT COURT**
19 **STATE OF NEVADA – LAS VEGAS**

20

21 BRADLEY STEPHEN COHEN, an
22 individual; and COHEN ASSET
23 MANAGEMENT, INC., a California
24 corporation,

25 Plaintiffs,

26 v.

27 ROSS B. HANSEN; NORTHWEST
28 TERRITORIAL MINT, LLC, a
Washington limited liability company;
and STEVEN MERRILL FINCH,

Defendants.

Case No.

**PLAINTIFFS' VERIFIED
COMPLAINT; DEFAMATION AND
DEFAMATION PER SE; INVASION
OF PRIVACY/FALSE LIGHT;
INTENTIONAL INFILCTION OF
EMOTIONAL DISTRESS;
INTENTIONAL INTERFERENCE
WITH PROSPECTIVE BUSINESS
ADVANTAGE; INJUNCTIVE
RELIEF**

DEMAND FOR JURY TRIAL

1 Plaintiffs Bradley Stephen Cohen and Cohen Asset Management, Inc., for
 2 their Complaint against Defendants Ross B. Hansen, Northwest Territorial Mint,
 3 LLC, and Steven Merrill Finch, allege and state as follows:

4 **THE PARTIES**

5 1. Plaintiff Bradley Stephen Cohen ("Bradley Cohen") is an individual
 6 who resides in Los Angeles, California. Plaintiff Bradley Cohen is the President
 7 and Chief Executive Officer of Cohen Asset Management, Inc.

8 2. Plaintiff Cohen Asset Management, Inc., a California corporation, is a
 9 privately held real estate investment firm. Through affiliated entities, Plaintiff
 10 Cohen Asset Management, Inc. acquires, finances, operates and is involved with the
 11 disposition of industrial properties across the United States.

12 3. Plaintiffs are informed and believe that at all times relevant to this
 13 action, Defendant Ross B. Hansen ("Ross Hansen") is and was a resident of King
 14 County, Washington and he is and was a part-time resident of Nevada, where he
 15 oversees his company Defendant Northwest Territorial Mint, LLC.

16 4. Plaintiffs are informed and believe that Defendant Northwest
 17 Territorial Mint, LLC is a Washington limited liability company owned solely
 18 and/or controlled by Defendant Ross Hansen. Northwest Territorial Mint, LLC's
 19 "physical address" (as described on its website) is 80 East Airpark Vista Boulevard,
 20 Dayton, Nevada 89403.

21 5. Plaintiffs are informed and believe that Defendant Steven Merrill Finch
 22 ("Steven Finch") is a resident of Nevada who is currently on active duty with the
 23 United States Army and is stationed at Fort Bragg, North Carolina.

24 **JURISDICTION AND VENUE**

25 6. This Court has jurisdiction over this matter because Defendant
 26 Northwest Territorial Mint, LLC is located in and conducts business in Nevada,
 27 Defendant Ross Hansen wholly owns Defendant Northwest Territorial Mint, LLC
 28 and spends significant time in Nevada overseeing his company, and Defendants

Ross Hansen and Steven Finch have caused events occurring in Nevada giving rise to the causes of action alleged herein, i.e., they published and/or arranged to publish false and defamatory websites about Plaintiffs from Nevada.

7. The amount in controversy, represented by the potential loss in business to Plaintiffs and the potential damage to Plaintiffs' reputation, exceeds the jurisdictional minimum of \$75,000.00, exclusive of interest and costs. This Court therefore has jurisdiction over this matter pursuant to 28 U.S.C. § 1332(a).

8. Venue is proper in this District pursuant to 28 U.S.C. § 1391, because all Defendants are residents of Nevada and a substantial part of the events or omissions giving rise to the claim occurred in this District.

THE RELEVANT FACTS

A. The Websites and Internet Postings.

9. In April 2012, a defamatory and malicious website was discovered by Plaintiffs located at <http://bradley-cohen.com> ("bradley-cohen.com"). Copies of the web pages are attached hereto as Exhibit 1. The website was an intentionally false and disparaging publication seeking to harm and injure Plaintiffs. It compares Plaintiff Bradley Cohen to the notorious fraud and Ponzi scheme perpetrator Bernard L. Madoff ("Bernie Madoff"). The website was anonymously set up by the Defendants in a way to attempt to hide the ownership of the site. Other related web postings and blogs directing back to the site were established by Defendants. See Exhibit 2. These postings linked back to the subject website or another nearly identical site set up at <http://bradleyscohen.com> ("bradleyscohen.com"). See www.bradleyscohen.com web pages (6/4/12 and 7/24/12 versions), Exhibit 3.

10. Defendants intentionally conspired to create and publish the websites bradley-cohen.com (which is now defunct, as explained below in paragraph 50) and bradleyscohen.com (which is still live at the time of filing this Complaint), for the purpose of damaging Plaintiffs' reputation and causing economic harm to Plaintiffs' business. Both websites (as well as the related blogs and posts) contain explicit and

1 implicit false and defamatory statements.

2 11. The home page for bradley-cohen.com was titled "Bradley S. Cohen's
 3 Investors Lose Tens of Millions of Dollars." Although bradleyscohen.com
 4 contained the same false and defamatory statement as of June 4, 2012, the website
 5 has since removed that particular statement.

6 12. The subtitles of bradley-cohen.com was, and bradleyscohen.com
 7 continues to be, "Is Bradley S. Cohen the Next Bernie Madoff? The alarming
 8 similarities between these two investment firm founders." Both websites contain
 9 photos of Plaintiff Bradley Cohen juxtaposed with a photo of Bernie Madoff, the
 10 latter whose name and face are synonymous with fraud, greed, and white collar
 11 crime. Both websites are intended to give rise to the false implication that Plaintiff
 12 Bradley Cohen, like Bernie Madoff, is a criminal and con artist who is scamming his
 13 investors through a Ponzi scheme. A visitor to the websites is led to believe by
 14 Defendants' careful and clever editing that Plaintiffs engaged in similar criminal acts
 15 as those committed by Bernie Madoff.

16 13. There is absolutely no factual basis for such false and scandalous
 17 allegations. Plaintiff Bradley Cohen has a lifetime history of success and integrity,
 18 and a stellar reputation. As CEO of Cohen Asset Management, Plaintiff Bradley
 19 Cohen oversees the business activities of Plaintiff Cohen Asset Management Inc.,
 20 and its affiliated entities. Through affiliated entities, Plaintiff Cohen Asset
 21 Management, Inc.'s portfolio has included extensive industrial and office properties
 22 held nationally, with current holdings comprising several million square feet, and a
 23 current estimated value of several hundred million dollars. Plaintiff Bradley Cohen
 24 resides in Los Angeles, California with his wife, Cheryl, of 30 plus years. Plaintiff
 25 Bradley Cohen is an active member in the Los Angeles area community, Plaintiff
 26 Bradley Cohen has been honored as Man of the Year by the Boy Scouts of America,
 27 is a member of the Board of Governors at Cedars Sinai Medical Center, received the
 28 Golden Shofar Award from Yeshiva Gedolah and has served on the National Board

1 of the Friends of the Israeli Defense Forces (FIDF). Plaintiff Bradley Cohen has
 2 been a speaker at industry conferences and serves on the Board of Directors of the
 3 National Association of Real Estate Investment Managers organization (NAREIM)
 4 and was a past member of the Pension Real Estate Association (PREA).

5 14. The comparison in the malicious websites of Plaintiff Bradley Cohen to
 6 the notorious con man Bernie Madoff is extraordinarily false, misleading, malicious
 7 and damaging.

8 15. Bernie Madoff is perhaps the most reviled financial fraudster in United
 9 States history. Bernie Madoff operated a fictitious investment firm that supposedly
 10 invested billions of dollars of customers' assets even though the firm had not
 11 actually traded any securities for more than a decade at the time its Ponzi scheme
 12 unraveled in 2008. Bernie Madoff and his accomplices knowingly created false
 13 trading confirmations and account statements for clients purporting to show
 14 investment transactions that never took place. Bernie Madoff pled guilty on March
 15 12, 2009 to eleven felonies involving securities fraud, mail fraud, investment adviser
 16 fraud, money laundering, perjury and theft, and is serving a 150 year prison
 17 sentence. While Bernie Madoff's operation was supposedly audited, the reality was
 18 that his accountant, David Friehling, was a small-time auditor with a tiny office in
 19 suburban, New York, who simply rubber stamped Bernie Madoff's manufactured
 20 records. In November of 2009, David Friehling pled guilty to criminal fraud.
 21 Bernie Madoff's fraud became a global scheme that ensnared hedge funds, charities
 22 and individuals. Bernie Madoff enticed thousands of investors, including figures
 23 like Senator Frank Lautenberg of New Jersey, the Hall of Fame pitcher Sandy
 24 Koufax and a charity run by Elie Wiesel, the Nobel Peace Prize laureate. The
 25 fraud's collapse erased as much as \$65 billion that his customers thought they had
 26 on account with Bernie Madoff's firm.

27 16. In contrast, Plaintiff Bradley Cohen has a stellar reputation in the real
 28 estate industry. Plaintiffs Bradley Cohen and Cohen Asset Management, Inc. have

1 successful track records as investors of primarily industrial properties in select
 2 submarkets throughout the United States, including Oregon, Southern California,
 3 Northern California, Arizona, Texas, South Carolina, Missouri, and other major
 4 areas. Unlike Bernie Madoff who falsified accounts and transactions that never
 5 occurred, all of Plaintiffs' and their affiliates' substantial real estate investments are
 6 matters of public record, and can be readily verified in state and local offices where
 7 real estate ownership documents are lawfully recorded. Plaintiffs use appraisers
 8 such as CB Richard Ellis ("CBRE") and Blake Global. Additionally, each
 9 transaction includes reputable law firms such as Gibson, Dunn & Crutcher, certified
 10 public accountants, third party zoning experts (PZR), environmental professionals,
 11 engineers (civil and mechanical), Title Companies such as First American Title,
 12 nationally recognized mortgage brokers such as Holiday Fowler & Fenoglio, and
 13 nationally recognized real estate brokers such as Lee & Associates and CBRE.
 14 Moreover, when lenders are involved, the lenders also do their own due diligence.

15 17. Plaintiffs' investment experience spanning over several decades
 16 includes more than 100 commercial and industrial properties acquired and more
 17 than 100 properties sold. Plaintiffs' senior management group collectively has more
 18 than 80 years combined experience in the real estate industry. Plaintiffs' executive
 19 management team includes a chief investment officer with a graduate degree in real
 20 estate development from the University of Southern California, a chief operating
 21 officer with degrees from Cornell University and the University of Michigan, and a
 22 chief financial officer who has a CPA background with a major national accounting
 23 firm and experience with a NYSE listed company's finance team.

24 18. Plaintiffs' investors and joint venture partners have included private
 25 equity funds, entities with public pension funds, insurance companies, as well as
 26 sophisticated high-net-worth individuals. Moreover, Plaintiffs' fund business has
 27 been audited annually by Deloitte & Touche LLP, one of the largest and most
 28 respected big four accounting firms in the world.

1 19. In short, Defendants' comparison of Plaintiffs with Bernie Madoff on
 2 both websites, including the display of Plaintiff Bradley Cohen's photograph with
 3 that of Bernie Madoff, was intentionally edited to confuse and mislead the reader
 4 and give rise to the false and defamatory implication that Plaintiffs are financial
 5 fraudsters in the same vein as Bernie Madoff.

6 20. Defendants also intentionally edited bradley-cohen.com to give rise to
 7 the false implication that Plaintiff Bradley Cohen was convicted of fraud in
 8 Philadelphia in the early 1990s. The website had a subpage entitled "History of
 9 Convictions" and recited scandalous allegations against Plaintiffs committed by
 10 someone who is definitely not Plaintiff Bradley Stephen Cohen.

11 21. The Brad S. Cohen that was the subject of a fraud conviction in
 12 Philadelphia in the early 1990s is named Brad Scott Cohen. This fact is easily
 13 verifiable from court records, news articles and public records available online to
 14 the public, including Defendants. *See* attached court records easily obtained from
 15 public records available on the Internet, Exhibit 4. *See also* news articles
 16 concerning Brad Scott Cohen conviction, Exhibit 5. Plaintiff is Bradley Stephen
 17 Cohen, not Brad Scott Cohen. Plaintiff Bradley Stephen Cohen was born in June of
 18 1956 and is 56. *See* Bradley Stephen Cohen Lexis Public Records Report Excerpt,
 19 Exhibit 6. According to public records, Brad Scott Cohen of Philadelphia was born
 20 in March of 1959 and is 53. *See* Brad Scott Cohen Lexis Public Records Report
 21 Excerpt, Exhibit 7.

22 22. Defendants knowingly and intentionally ignored, or with reckless
 23 disregard failed to confirm via basic online research, that Plaintiff Bradley Stephen
 24 Cohen is not the Brad Scott Cohen of Philadelphia with the fraud conviction.
 25 Without question the writers of bradley-cohen.com spent many hours gathering
 26 photos of Plaintiff Bradley Cohen and his home, and other information, with the
 27 intent of damaging Plaintiffs' reputation and business with these false associations.
 28 At best, Defendants were willfully blind and had no regard for the veracity of the

1 information they published with regard to whether Plaintiff Bradley Cohen was
 2 convicted of fraud. More likely, Defendants knew they had the wrong Bradley S.
 3 Cohen when they purposely created the false implication that the two men were one
 4 and the same.

5 23. In addition to the implied defamatory charges that Plaintiffs are guilty
 6 of crimes similar to those committed by Bernie Madoff and that Plaintiff Bradley
 7 Cohen was convicted of fraud, the bradley-cohen.com website contained, and the
 8 bradleyscohen.com website continues to contain, numerous expressly false,
 9 misleading and defamatory statements.

10 24. Both bradley-cohen.com falsely asserted, and bradleyscohen.com
 11 continues to falsely assert, that Plaintiffs' and their related companies' "losses
 12 continue to mount as the companies lose tenants."

13 25. Both bradley-cohen.com falsely asserted, and bradleyscohen.com
 14 continues to falsely assert, that "Company assets have been looted" and that "Cohen
 15 Asset Management's intricate dealings . . . are so complicated an army of
 16 investigators may be necessary to unravel the web." These fabricated statements are
 17 untrue as there is transparency with real estate assets, which are recorded in public
 18 records.

19 26. Both bradley-cohen.com falsely asserted, and bradleyscohen.com
 20 continues to falsely assert, that "Investigators have speculated that Cohen Asset
 21 Management . . . is actively engaging in lawsuits in an attempt to hold off creditors
 22 seeking financial information." In reality, there are no such "investigators" looking
 23 into Plaintiff Cohen Asset Management, Inc., and the allegations regarding lawsuits
 24 and attempts to hold off creditors are false and without basis.

25 27. Both bradley-cohen.com falsely asserted, and bradleyscohen.com
 26 continues to falsely assert, "Beware of leasing from Cohen Asset Management or
 27 from any of its companies, who are known to sue tenants and former tenants based
 28 on unfounded accusations and greed." This is a false and defamatory statement

1 without any basis in fact.

2 28. Both bradley-cohen.com falsely asserted, and bradleyscohen.com
 3 continues to falsely assert, that "Under Bradley Cohen's stewardship, the company
 4 and its properties have been involved in numerous lawsuits. In a current Seattle
 5 lawsuit, the company is attempting to scam former tenants out of millions of dollars.
 6 The company has taken several hundred thousand dollars from one former tenant in
 7 the lawsuit. How many millions has it taken from its thousands of other tenants?"
 8 Defendants are referring to the lawsuit brought by the landlord of industrial space
 9 formerly leased by Defendants Ross Hansen and Northwest Territorial Mint, LLC,
 10 which lease Defendants breached by, among other things, leaving the premises
 11 environmentally contaminated. Two prejudgment remedies have been issued
 12 against Defendants Ross Hansen and Northwest Territorial Mint, LLC for more than
 13 a half million dollars based upon findings made by the judge in the case against
 14 Defendants. The lawsuit against Defendants is the motivation behind Defendants'
 15 smear campaign against Plaintiffs. The suggestion that Plaintiffs have "scammed"
 16 tenants or that they have wrongfully taken "millions" from other tenants is false,
 17 without factual basis, and defamatory.

18 **B. Defendants' Attempts to Hide Their Involvement and Their Malicious**
 19 **Intent.**

20 29. Defendants established the websites and Internet postings through
 21 means intended to conceal their involvement. Defendants used off-shore and
 22 anonymous hosting companies, PayPal accounts, and intermediaries to be front
 23 persons for their misconduct.

24 30. Through a series of demand letters to the website registrant and the
 25 webhost, Plaintiffs were able to have the first website, bradley-cohen.com, taken
 26 down. However, Defendants relocated the information to various other places on
 27 the Internet.

28 31. The reason Defendants defamed Plaintiffs was retaliation. Defendants

1 Ross Hansen and Northwest Territorial Mint, LLC formerly leased space in a
 2 commercial industrial property located at 1307 West Valley Highway North,
 3 Auburn, Washington 98001 ("Auburn Property"). At the time, the Auburn Property
 4 was owned by Auburn Valley Industrial Capital LLC ("AVIC"), a company
 5 affiliated with Plaintiffs. AVIC initiated two lawsuits (the first in 2009 and the
 6 second in 2010) against Defendants Ross Hansen and Northwest Territorial Mint,
 7 LLC related to their breaches of the lease between AVIC and Defendants, which
 8 expired on April 30, 2010. The cases, which have been consolidated, are captioned
 9 Auburn Valley Industrial Capital LLC v. Ross B. Hansen, et al., King County Case
 10 No. 10-2-41256-5 KNT and 09-2-41614-1 KNT ("AVIC v. NW Mint Litigation").
 11 The claims made against Defendants include environmental contamination of the
 12 formerly leased premises and the damages claimed are over \$1 million, plus legal
 13 fees and costs. The trial of the matter commenced on July 30, 2012 and is pending.

14 32. Defendant Ross Hansen was a very difficult tenant, not only for AVIC,
 15 but for its predecessor, MegaWest, LLC. Defendant Ross Hansen has on many
 16 occasions demonstrated himself to be very contemptuous of the landlord and the
 17 Defendants' obligations under the lease. For example, while a tenant at the Auburn
 18 Property, Defendant Ross Hansen repeatedly broke into the locked
 19 telecommunications room in the building, at least once by cutting through the
 20 adjoining wall between the leased premises and the telecommunications room for
 21 the building, rather than making proper arrangements to access that room through
 22 Plaintiffs' local property manager. Defendant Ross Hansen even did so despite a
 23 temporary restraining order entered on November 16, 2009 which was modified on
 24 November 20, 2009, and a preliminary injunction entered by Judge Cheryl Carey of
 25 the King County Superior Court on December 11, 2009 (Exhibit 8), prohibiting
 26 Defendant Ross Hansen from doing so, which was called to the court's attention in a
 27 subsequent hearing at which Defendants' counsel was admonished by the court
 28 concerning the violation. Defendant Ross Hansen also repeatedly intimidated and

1 failed to cooperate with the local property manager, Chanda Sovan.

2 33. In addition, after the AVIC v. NW Mint Litigation commenced,
 3 Plaintiffs learned that Defendant Ross Hansen has a long prior history of
 4 disrespecting law and authority. For example, in 1995 a *Seattle Times* article
 5 reported that Defendant Ross Hansen is a "convicted tax cheat, suspected drug-
 6 money launderer and confirmed government hater" who had just spent "nearly three
 7 years in federal prison." The article addressed Defendant Ross Hansen's lawsuit
 8 against the City of Kent alleging police officers violated his constitutional rights and
 9 drove him out of business, pleading guilty to IRS tax charges, a subsequent
 10 bankruptcy, his alleged fraud of several customers, and threats of violence to city
 11 officials. The article also reported about Defendant Ross Hansen's "penchant for
 12 defying the law, angering some of his customers and openly fighting with the
 13 government." *See Seattle Times* "Tarnished Metals Dealer Makes Comeback --
 14 Auburn Man Says Kent Police, City 'Ruined My Life'", January 18, 1995, Exhibit 9.
 15 Defendant Ross Hansen served time in the U.S. Penitentiary in Lompoc, California
 16 but was moved among facilities for getting in fights with other inmates and people
 17 in authority at the facility. *See Ross B. Hansen Deposition Transcript*, January 31,
 18 2012, pp. 57-59, Exhibit 10.

19 34. Plaintiffs have also discovered records from the Washington
 20 Department of Ecology that reflect Defendant Ross Hansen's history of being
 21 uncooperative with investigators from the Department of Ecology when they sought
 22 to inspect his leased premises at Plaintiffs' property on several occasions, with
 23 Defendant Ross Hansen often telling them to get a warrant. *See Wash. Dept. of*
 24 *Ecology Records*, Exhibit 11.

25 35. In the AVIC v. NW Mint Litigation, the prior owner of the property
 26 was deposed and made clear that Defendant Ross Hansen was a very difficult person
 27 who refused access to the premises to not only the owner, but to police and
 28 firefighters. *See Eric Turbak Deposition Transcript Excerpt*, pp. 14-16, Exhibit 12.

1 36. In the AVIC v. NW Mint Litigation, Defendant Ross Hansen also
 2 threatened in his January 31, 2012 deposition to make it "painful" for Plaintiffs.
 3 Specifically, Defendant Ross Hansen testified in his deposition that "we're going to
 4 start ratcheting up the pain. And you know what? . . . Your client will roll over on
 5 the lawsuit." *See* Defendant Ross Hansen 1-31-12 Deposition Transcript Excerpt,
 6 Exhibit 13. Defendant Ross Hansen certainly was not referring to the merits of his
 7 case, as two prejudgment remedy orders had already been issued in the case against
 8 Defendant Ross Hansen totaling over a half million dollars. Moreover, Defendant
 9 Ross Hansen has filed numerous dispositive motions, all of which were denied, as
 10 were several requests for review by the Court of Appeals. Upon information and
 11 belief, Defendant Ross Hansen was threatening to do something outside of the
 12 AVIC v. NW Mint Litigation to "ratchet up the pain" to the Plaintiffs. Notably, the
 13 website which had been prepared previously was activated within hours of the
 14 issuance of a court ruling adverse to Defendant Ross Hansen in the AVIC v. NW
 15 Mint Litigation on April 23, 2012.

16 37. Defendant Ross Hansen is the source of the content contained on the
 17 disparaging websites, and some of the information in the websites could only have
 18 come from Defendant Ross Hansen or his attorney, including references to non-
 19 public information, such as the deposition of Plaintiffs' employee Doreen Ray in the
 20 AVIC v. NW Mint Litigation, who was the corporate representative designated by
 21 AVIC for a deposition of AVIC taken by Defendant Ross Hansen's legal counsel.

22 38. The statements contained in the web page bradley-cohen.com
 23 obviously came directly from Doreen Ray's deposition. The false website states:

24 Senior company leadership was "uncomfortable" and refused to answer
 25 questions about him and his financial dealings.

26 *See Exhibit 1.*

27 39. This information could only be in reference to Doreen Ray's deposition
 28 in the AVIC v. NW Mint Litigation. There have been no other depositions of senior

1 company leadership of Plaintiff Cohen Asset Management, Inc.

2 The false website goes on to state:

3 Recently, the Senior Vice President of Cohen Asset Management,
4 Doreen Ray (pictured right), was asked under oath about the intricacies
5 of company finances. Her response was initially evasive, then
ultimately revealed the following ominous facts:

6 She expressed a **complete inability to explain any details of the**
7 **company's financial transactions**, despite being the highest ranking
officer on the Asset Management Team.

8 She stated that she was **uncomfortable answering questions** about
Bradley Cohen and his financial dealings.

9 Properties owned by Cohen Asset Management or its related companies
10 have **occupancy rates as low as 28%**.

11 Properties owned by Cohen Asset Management or its related companies
are **currently generating operating losses**.

12 **Losses continue to mount** as the companies lose tenants.

13 She **does not know where the money is coming from to cover the**
14 **operating losses**, but does know that the companies can dip into a
15 revolving line of credit through which all Cohen Asset Management
companies are financed.

16 * * *

17 Losses of the Cohen Asset Management's CAM Core+ Fund 1 are clear
18 from the company's financial statement below. How can a company
and its owner profit while investors are losing big?

19 See Exhibit 1 (emphasis in original).

20 40. In Doreen Ray's deposition on December 7, 2011, the following
21 interchange took place, which was intentionally mischaracterized in the derogatory
22 websites:

23 16 Q Let me stop you for a second because you used the
24 17 word "Auburn." When I use the word "Auburn," I want
25 18 that to include Cohen Asset Management and all the
26 19 companies related to Cohen Asset Management.

27 20 MR. MITCHELL: She's not here as a 30(b)(6)
28 21 witness of those other companies. She's only here on
22 behalf of Auburn Valley, and she's not going to answer
23 questions on behalf of Cohen Asset Management.

24 24 MR. VON KALLENBACH: Actually, she will answer
25 25 whatever questions I put to her unless you instruct her
0041

1 not to.

1 2 Q So my question is, is Cohen Asset Management aware
2 3 of other properties that have been contaminated like
3 4 it's claimed this property is contaminated?

4 5 MR. MITCHELL: Only if you know.

5 6 A I'm uncomfortable answering on behalf of Cohen
6 7 Asset Management, and that's not what I was called in
7 8 to do. So I will not answer that question.

8 9 Q I appreciate that, but I would still like an
9 10 answer.

10 11 A I would rather not answer that question.

11 12 Q Again, while I appreciate that you might not want
12 13 to answer the question, I am entitled to an answer and
13 14 I would like to have one, please.

14 15 MR. MITCHELL: She told you that she's not
15 16 authorized or competent to testify on behalf of a
16 17 company for which she was not called, and she's not
17 18 going to answer your question.

18 19 See Doreen Ray Deposition, Vol. 1, p. 40-41, Exhibit 14.

20 21 41. While the derogatory websites' descriptions of Doreen Ray's testimony
21 22 totally distort and mischaracterize her deposition testimony, the existence and
22 23 specifics of her testimony and deposition in the AVIC v. NW Mint Litigation is
23 24 something that is not a public record and only something the parties in the AVIC v.
24 25 NW Mint Litigation would have knowledge of and be able to access.

26 27 42. The statements concerning the operations of the CAM Core+ Fund 1
27 28 appear to be distortions of information taken out of context and misrepresented from
28 29 the CAM Core+ Fund 1 report, which Defendant Ross Hansen said he located on the
29 30 Internet. In fact, the bradley-cohen.com web page indicates the source of such
30 31 information is the "3rd Quarter Financial Report." Perhaps not surprisingly, in the
31 32 AVIC v. NW Mint Litigation, Defendants introduced the CAM Core+ Fund 1 3rd
32 33 Quarter Financial Report, as deposition exhibit 104 in Doreen Ray's deposition. It is
33 34 the only CAM Fund report Defendants used in the case, and the only one referred to
34 35 in the derogatory websites and blogs.

36 37 43. In Doreen Ray's deposition on February 2, 2012, Defendants explained
37 38 the source of the CAM Core+ Fund 1 3rd Quarter Financial Report as follows:

39 40 0096

41 42 1 (Lunch break.)

42 43 2 MR. VON KALLENBACH: Over the lunch break I

1 3 talked to Mr. Hansen regarding Exhibit No. 4, which is
2 4 the CAM Core Plus Fund 1 quarter report. He did not
3 5 get it from the Cohen Asset Management website. So he
4 6 didn't download it from the website and he hasn't
5 7 downloaded anything else from the website. He found it
6 8 during an Internet search. I think he said he tried
7 9 plugging in things like Cohen Asset Management or
8 10 whatever and came up with this single document. It's
9 11 the only quarter report we have.

10 12 MR. MITCHELL: He's absolutely certain that he
11 13 did not get it off of the CAM website? I just need to
12 14 know that from a security standpoint.

13 15 MR. VON KALLENBACH: He says he did not. I
14 16 certainly tried to do it over the lunch hour myself to
15 17 see if I could get it. If you click on to "Industrial
16 18 Relations," it takes you to a password and an ID
17 19 number. As Ross says, he's not that smart.

18 20 MR. MITCHELL: The other question we had was,
19 21 has he downloaded anything else from the Cohen Asset
20 22 Management website other than what's -- did he?

21 23 MR. VON KALLENBACH: I have no idea if he did.
22 24 It would have been the same stuff I downloaded, which
23 25 are the publications, like Ms. Ray's photograph and all
0097

24 1 the bios and stuff like that; but nothing confidential.

25 14 See Doreen Ray Deposition, Vol. 2, pp. 96-97, Exhibit 15.

26 15 44. Another area of disparagement in the websites is Defendants'
27 16 description of Plaintiffs' so-called "Intricate Business Connections":

28 17 Bradley S Cohen is associated with an intricate web involving a
18 18 number of companies, including 121 Canyon Office Gp, Inc., 651 East
19 19 Corporate Drive Industrial Capital LLC and Cohen Asset Management,
20 20 Inc.. Bradley S Cohen has 3 known relationships including Brandon
21 21 Delf, Cam Core & Fund I', LLC and Cam Fund Capital I', LLC and is
22 22 located in Los Angeles, CA.

23 23 See Exhibits 1 and 3. Defendants imply that there is something deceptive about
24 24 Plaintiff Bradley Cohen's business activities through various companies with which
25 25 he is affiliated or controls. In his deposition, Defendant Ross Hansen made a similar
26 26 disparaging remark about Plaintiff Cohen Asset Management, Inc.'s corporate
27 27 hierarchy as follows:

28 2 Q "This company" being who?
29 3 A This company being Cohen's group, Mr. Olson and Maureen,
30 4 you know, whichever -- AVI and the -- **the shell of**
31 5 **companies that they -- they operate in.**

232615.4 28 See Defendant Ross Hansen Deposition, Vol. 2, p. 278, Exhibit 16 (emphasis

1 | added).

2 45. At another time, Defendant Ross Hansen said the following in his
3 deposition testimony:

17 THE WITNESS: Your clients and I were
18 involved in some pretty contentious litigation, and your
19 clients are also upside down on this building. **In fact,**
20 **your building is near bankruptcy. It's insolvent.**
21 Q (By Mr. Moxon) The building is near bankruptcy?
22 A **The building is insolvent, according to its own financial**
23 **statements.**
24 Q And where do you find -- where do you have the building
25 financial statements?
0267
1 A They're available through public sources.
2 Q This building?
3 A This particular building --
4 Q And you --
5 A -- is available -- its financials are -- are published by
6 the entity.
7 Q What entity?
8 A **The controlling entity, which is the CAM 3 or whatever**
9 **development firm. And this building is insolvent.**
10 Q The building is insolvent?
11 A The entity that owns and controls this building is
12 insolvent.
13 Q And what entity is that?
14 A **Which is the controlling entity, which I believe is CAM 3**
15 **or whatever it is.**
16 Q And what was the source of that information for you?
17 A Was their own financial declarations.
18 Q Their financial declarations.
19 A **Their financial reporting to their investors.**
20 Q And where was that provided to you?
21 A It was available on the Internet.
22 Q And when did you read that?
23 A Just last week.
24 Q Okay. And what does that have to do with the -- what
25 triggered the investigation?
0268
1 A **Your clients have been using -- and it's right in their**
2 **report -- have been using the -- the possible**
3 **contamination of our space as a foil to hold off their**
4 **investors and explain away their poor investment on -- on**
5 **their building, and have publicly blamed us for their --**
6 **their building being a money pit, that their building is**
7 **not producing, quote, the returns that they had**
8 **anticipated, and it's -- it was -- and it's because of**
9 **Northwest Territorial Mint and the possible**
10 **contamination.**
11 Q Are those all words that were in the report, or you're
12 putting, like, "the money pit"? That doesn't sound
13 like --

14 A Well, the money pit is my words, but their -- I think
 15 their quote was, is the reason that the -- that the
 16 building is not producing the returns is because the
 17 contamination by Northwest Territorial Mint, which we
 18 hope then to recover, and it goes on and on and on.

19 Q Okay.

20 A **Your client has been using this issue as a foil to hold**
 21 **off their creditors and their investors for their poor**
 22 **performance, and that's all this is.**

23 Q In your opinion?

24 A It's -- in my opinion, it's all theater.

7 See Defendant Ross Hansen Deposition, Vol. 2, pp. 266-268, Exhibit 17 (emphasis
 8 added). Defendant Ross Hansen's diatribe is a very close paraphrase of what was on
 9 the derogatory websites and blog postings that Defendants published.

10 46. The above information demonstrates Defendant Ross Hansen is the
 11 source of the defamatory websites bradley-cohen.com and bradleyscohen.com. In
 12 short, Defendants took information from the deposition of Doreen Ray, which is not
 13 a public record, plus the CAM Core+ Fund 1 3rd Quarter Financial Report, together
 14 with general information available on the Internet and created the attack websites
 15 bradley-cohen.com and bradleyscohen.com.

16 47. Another reason why it is clear Defendants are responsible for the
 17 defamatory web material is the following statement on the disparaging websites:

18 Beware of leasing from Cohen Asset Management or from any of its
 19 companies, who are known to sue tenants and former tenants based on
 20 unfounded accusations and greed. Under Bradley Cohen's stewardship,
 21 the company and its properties have been involved in numerous
 22 lawsuits. In a current Seattle lawsuit, the company is attempting to
 23 scam former tenants out of millions of dollars. The company has taken
 24 several hundred thousand dollars from one former tenant in one
 25 lawsuit. How many millions has it taken from its thousands of other
 26 tenants?

27 See Exhibits 1 and 3.

28 48. The above statements are significant. First, Plaintiff Cohen Asset
 29 Management, Inc. is not the owner of the property. Second, the allegation that the
 30 company is "known to sue tenants and former tenants based on unfounded
 31 accusations and greed" has no basis in fact. If this website was the creation of a
 32 disgruntled investor, it would not logically address or sympathize with the tenants.

1 A disgruntled investor would not use phrases such as "the company is attempting to
 2 scam former tenants out of millions of dollars" or "How many millions has it taken
 3 from its thousands of other tenants?" The statements are inconsistent with the
 4 position of an investor, who has lost money because of the declining real estate
 5 market and tenants whose businesses have failed and left properties underwater.

6 49. In his deposition on January 31, 2012, Defendant Ross Hansen
 7 threatened to make the AVIC v. NW Mint Litigation painful for the Plaintiff, AVIC.
 8 The testimony was as follows:

9 3 A **And -- and also, I'm going to inflict lots of pain on**
 10 4 **your client.** And just like the -- the fish --
 11 5 Q How are you going to inflict lots of pain on my client?
 12 6 I take that as some kind of threat.
 13 7 A There's no threat in -- at all.
 14 8 Q Oh.
 15 9 A I would never physically harm your client. **I'm going to**
 16 10 **do everything within the legal means.** But, you know,
 17 11 **your client has got problems, and I'll tell you**
 18 12 **something.**
 19 13 **I've been actually quite mellow to this point, but**
 20 14 **we're going to start ratcheting up the pain. And you**
 21 15 **know what? Just like the fish and game, they returned**
 22 16 **the duck. Your client will roll over on the lawsuit.**

17 See Defendant Ross Hansen Deposition, Vol. 1, p. 160, Exhibit 13 (emphasis
 18 added).

19 50. Upon learning of the original website, bradleyscohen.com, Plaintiffs
 20 researched available information on the website registrant. The disclosed registrant
 21 of the original website is a company named Namecheap, Inc. and its division
 22 Whoisguard of Los Angeles, California. The webhost of the website at issue in this
 23 matter is LeaseWeb, B.V. at an address of Ocom B.V., P.O. Box 93054, 1090 BB
 24 Amsterdam, Netherlands. Upon learning the website registrant and webhost,
 25 Plaintiffs' counsel sent them demand letters. See Exhibits 18 and 19. Thereupon,
 26 the original disparaging website bradley-cohen.com was taken down. The attorney
 27 for the website registrant wrote Plaintiffs' counsel on May 11, 2012 and identified
 28 the owner of the website as Scott R. Chambers, Azudo, 18 Winnet Way,

1 Southwater, West Sussex RH139TB, phone +44.01403733467, e-mail
 2 sales@azudo.com. *See* May 11, 2012 Eugene Rome Letter, Exhibit 20.

3 51. Plaintiffs obtained records from Scott Chambers, which reflect Scott
 4 Chambers communicated with Defendant Steven Finch, who used the e-mail
 5 address 80teasal@gmail.com concerning the websites. E-mail correspondence from
 6 Defendant Steven Finch to Scott Chambers was sent from the IP address of NW
 7 Mint in Nevada, where Defendant Northwest Territorial Mint, LLC currently
 8 operates a facility. *See* Scott Chambers' correspondence and enclosures, Exhibit 21.
 9 Other communications were anonymous but came from the IP address of NW Mint
 10 in Nevada [63.234.13.2], where Defendant Northwest Territorial Mint, LLC
 11 currently operates its facility. *See* Scott Chambers' affidavit and records, Exhibit 22.
 12 *See also* IP address verification for NW Mint location, Exhibit 23.

13 52. In an e-mail dated May 2, 2012, Defendant Steven Finch sent an e-mail
 14 to Scott Chambers inquiring as follows:

15 You took our web site down. We paid for a year in advance through
 16 PayPal, and have the documentation for that, so what gives? Is there
 17 some mistake on your end? What needs to be done to resolve the
 18 issue?

19 Do we need to double pay to get it back up?

20 Please help as this is an urgent issue for us and the error is on your end.
 21 Thanks

22 -S

23 [Sent from Steve Finch at 80teasal@gmail.com.]

24 This e-mail was sent from an IP address approximately a half-hour drive from the
 25 NW Mint facility in Nevada. The e-mail actually ordering the website listing was
 26 placed by Defendant Steven Finch at an IP address belonging to NW Mint. *See* 5-2-
 27 12 Steve Finch e-mail, Exhibit 24. Other documents produced by Scott Chambers
 28 also link the origination of the website to e-mails sent from NW Mint.

25 53. On July 10, 2012, Plaintiffs sent Defendant Steven Finch a demand
 26 letter regarding the websites. Subsequent to receipt of the letter by Defendant
 27 Steven Finch, a copy of the letter (with redactions of information identifying the
 28 recipient) was posted on the bradleyscohen.com website. *See*

1 www.bradleyscohen.com web pages (7/24/12 version), Exhibit 3.

2 54. Considerable steps have been taken by Defendants to distance
3 themselves from the websites and other Internet postings that defame Plaintiffs.
4 Defendants have used various registrants and webhosts that promise anonymity in
5 setting up websites. For example, Azudo is an anonymous host of various websites.
6 See attached article, Exhibit 25, and website at: <http://www.azudo.com/>.

7 55. Based upon comments on the Azudo website, it appears that Azudo's
8 business is to help people launch anonymous websites. Here are some excerpts
9 from the Azudo site:

10 We will register your new domain name for you and keep your
11 information private and away from prying eyes on the web. With an
12 Anonymous Domain Name(s) and Anonymous Hosting account you
13 can keep your identity 100% offline.

14 We keep you 100% anonymous because:
15 #1. We never ask for any of your personal information
16 #2. So..We can never give it out to third parties
17 #3. We can facilitate anonymous payment methods

18 100% Anonymous:

19 We never ask for any personal details except an email address
20 (which can be created anonymously). Accounts are setup using
21 usernames that use your email address only. There will be no Whois
22 information if someone does a search on your domain name. We will
23 not even show anyone the email address you signed up with. We accept
24 a number of easy payment providers including accepting cash by post
25 which gives you 100% anonymity.

26 We are very friendly, so don't be worried about asking us even
27 the silliest of questions we will be happy to help you.

28 Our packages are bigger and better than the competition. But
29 best of all our prices are the most affordable!

30 Our servers are located offshore from the USA and UK. All
31 accounts will be hosted in the Netherlands, this will provide clients
32 with greater privacy and security.

33 *Id.*

34 56. The second website, bradleyscohen.com, was set up using
35 anonymousSpeech.com as the domain registrant and a company known as Ecotel
36 based in the Netherlands as the webhost.

57. In addition to its potential prejudicial effect on the AVIC v. NW Mint Litigation, Defendants' malicious activity on the Internet has damaged Plaintiffs' reputation and has the potential to cause millions of dollars of damages, and in fact almost destroyed an approximately \$170 million deal. Plaintiffs may never know the potential business lost because of the websites.

58. Plaintiffs are active investors in real properties all over the country, dealing with sophisticated lenders, such as banks and insurance companies, and investors and joint venture partners, including private equity funds, entities with public pension funds, and sophisticated high-net-worth individuals—many of whom perform background checks on entities and people before investing or loaning their money. To the extent that these web postings come up in such background investigations, they are material detriments to anyone doing business with Plaintiffs.

LEGAL CLAIMS

FIRST CLAIM FOR RELIEF

(Defamation and Defamation Per Se By All Plaintiffs Against All Defendants)

59. Plaintiffs repeat and reallege each and every allegation of the Complaint as if herein again set forth in full.

60. Defendants' actions as alleged herein constitute defamation. Defendants conspired to knowingly and intentionally publish unprivileged, false, and defamatory statements of and concerning Plaintiffs.

61. Defendants published these statements out of malice, in retaliation for lawsuits filed by a company affiliated with Plaintiffs over Defendants' breaches of a lease of an industrial rental property.

62. Defendants' false statements have subjected Plaintiffs to hatred, contempt, ridicule or obloquy, lowered Plaintiffs' reputation in the estimation of the business community and deterred third persons from associating or dealing with them.

63. Defendants' statements constitute defamation per se as they defame

1 Plaintiffs in Plaintiffs' business and trade.

2 64. Defendants' acts of defamation have caused substantial damages to
3 Plaintiffs.

4 65. Based upon Defendants' tortious acts of defamation per se, Plaintiffs
5 are entitled to recover presumed damages, as well as their actual and consequential
6 damages against Defendants in a specific amount to be proven at trial.

7 66. Defendants have knowingly and intentionally engaged in conduct of a
8 malicious, oppressive, or fraudulent nature and have knowingly made false
9 statements of and concerning Plaintiffs, thereby entitling Plaintiffs to an award of
10 punitive damages.

11 **SECOND CLAIM FOR RELIEF**

12 **(Invasion of Privacy/False Light By All Plaintiffs Against All Defendants)**

13 67. Plaintiffs repeat and reallege each and every allegation of the
14 Complaint as if herein again set forth in full.

15 68. Defendants' actions as alleged herein constitute invasion of privacy.

16 69. The publication was substantial and resulted from conduct that would
17 be highly offensive and objectionable to the ordinary person.

18 70. The publication would be highly offensive to a reasonable person and
19 was, in fact, offensive to Plaintiffs.

20 71. Defendants' actions have caused damages to Plaintiffs.

21 72. Based upon Defendants' misconduct, Plaintiffs are entitled to recover
22 all of their actual and consequential damages against Defendants in a specific
23 amount to be proven at trial.

24 73. Defendants have engaged in conduct of a malicious, oppressive, or
25 fraudulent nature, thereby entitling Plaintiffs to an award of punitive damages.

THIRD CLAIM FOR RELIEF

(Intentional Infliction of Emotional Distress

By Plaintiff Bradley Stephen Cohen Against All Defendants)

74. Plaintiff Bradley Cohen repeats and realleges each and every allegation of the Complaint as if herein again set forth in full.

75. Defendants' actions toward Plaintiff Bradley Cohen in intentionally communicating false information regarding Plaintiff Bradley Cohen with the intent to cause Plaintiff Bradley Cohen emotional distress constitutes intentional infliction of emotional distress.

76. Defendants' actions were extreme in degree, outrageous in character, went beyond all possible bounds of decency, and are regarded as atrocious and utterly intolerable in a civilized community.

77. Based upon Defendants' intentional misconduct, Plaintiff Bradley Cohen is entitled to recover all of his actual and consequential damages against Defendants in a specific amount to be proven at trial.

78. Defendants have knowingly and intentionally engaged in conduct of a malicious, oppressive, or fraudulent nature, thereby entitling Plaintiff Bradley Cohen to an award of punitive damages.

FOURTH CLAIM FOR RELIEF

(Intentional Interference with Future Expected Business

By All Plaintiffs Against All Defendants)

79. Plaintiffs repeat and reallege each and every allegation of the Complaint as if herein again set forth in full.

80. Plaintiffs have valid contractual relationships and business expectancies, and Defendants knew or acted in assumption of such contractual relationships and business expectancies. Defendants' intentional actions in posting the false, defamatory information on the Internet has interfered with Plaintiffs' business dealings and/or threatens to cause a breach or termination of such

relationships or expectancies, and/or cause other parties to be hesitant to do business with Plaintiffs. Defendants' interference was for an improper purpose, and has caused damages to Plaintiffs.

81. Based upon Defendants' misconduct, Plaintiffs are entitled to recover all of their actual and consequential damages against Defendants in a specific amount to be proven at trial.

FIFTH CLAIM FOR RELIEF

(Injunctive Relief By All Plaintiffs Against All Defendants)

82. Plaintiffs repeat and reallege each and every allegation of the Complaint as if herein again set forth in full.

83. Plaintiffs request that, following a determination that the offending statements made and published by Defendants on the websites are false and defamatory, the Court enter a final and permanent injunction enjoining any republication of the offending statements and compelling Defendants to take down permanently the offending statements from the websites.

PRAYER FOR RELIEF

Based upon the foregoing facts, Plaintiffs request judgment awarding the following:

- A. For general and special damages as a result of Defendants' false and defamatory publications concerning Plaintiffs.
- B. For presumed damages for Defendants' knowing and intentional publication of defamation per se of Plaintiffs.
- C. For punitive damages.
- D. For attorneys' fees and costs incurred by Plaintiffs.
- E. For injunctive relief as requested herein.
- F. For such other relief in favor of Plaintiffs and against Defendants as the Court or other trier of fact deems just and appropriate under the circumstances.

1 **JURY DEMAND**

2 Plaintiffs demand trial by jury of the causes of action stated herein.

3

4 DATED: August , 2012

CHESNOFF & SCHONFELD

5

6 By 

7

8 DAVID CHESNOFF
RICHARD SCHONFELD
9 Attorneys for Plaintiffs

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VERIFICATION

STATE OF CALIFORNIA }
County of Los Angeles } ss

I, Bradley Stephen Cohen, an individual and President and Chief Executive Officer of Cohen Asset Management, Inc., do hereby state under oath, and declare under penalty of perjury, as follows:

9 I have read the foregoing Verified Complaint and its exhibits in their entirety,
10 have personal knowledge of the matters asserted therein, know the contents thereof,
11 and the same are true to the best of my knowledge and belief except as to those
12 matters alleged on information and belief, and as to those I believe them to be true.

Bradley Stephen Cohen

SUBSCRIBED AND SWORN before me by Bradley Stephen Cohen this day of August, 2012.

Notary Public

My commission expires:

232615.3

PLAINTIFFS' VERIFICATION

CALIFORNIA JURAT WITH AFFIANT STATEMENT

GOVERNMENT CODE § 8202

See Attached Document (Notary to cross out lines 1-6 below)
 See Statement Below (Lines 1-6 to be completed only by document signer[s], not Notary)

Signature of Document Signer No. 1

Signature of Document Signer No. 2 (if any)

State of California

County of Los Angeles

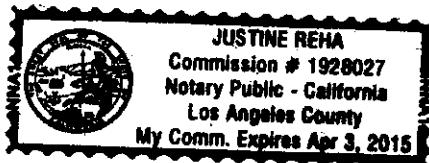
Subscribed and sworn to (or affirmed) before me

on this 3 day of August, 20 12
by(1) Bradley Stephen Cohen
Name of Signerproved to me on the basis of satisfactory evidence
to be the person who appeared before me (.) (✓)

(and)

(2) _____
Name of Signerproved to me on the basis of satisfactory evidence
to be the person who appeared before me.)

Signature

Justine Reha
Signature of Notary Public

Place Notary Seal Above

OPTIONAL

Though the information below is not required by law, it may prove valuable to persons relying on the document and could prevent fraudulent removal and reattachment of this form to another document.

Further Description of Any Attached Document

Title or Type of Document: _____

Document Date: _____ Number of Pages: _____

Signer(s) Other Than Named Above: _____

RIGHT THUMBPRINT OF SIGNER #1
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RIGHT THUMBPRINT OF SIGNER #2
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TABLE OF EXHIBITS

<u>Document</u>	<u>Exhibit No.</u>
http://bradley-cohen.com website excerpts (4/23/12 version)	1
Hubpages web page	2
www.bradleyscohen.com website excerpts (6/4/12 and 7/24/12 versions)	3
Brad Cohen (Philadelphia) court records excerpt	4
News articles concerning Brad Cohen (Philadelphia) criminal proceedings	5
Plaintiff Bradley Stephen Cohen public records report excerpt	6
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Seattle Times "Tarnished Metals Dealer Makes Comeback -- Auburn Man Says Kent Police, City 'Ruined My Life'", January 18, 1995	9
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4	Web article re Azudo.com	25
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